



Attorneys at Law

Jamie F. Friedman
t 212-351-3744
jfriedman@ebglaw.com

March 18, 2016

VIA ECF

Honorable James Orenstein
United States District Court - Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: Erick Rivera v. JPMorgan Chase Bank, 16 cv 329 (DLI) (JO)

Dear Judge Orenstein:

We represent the Defendant in the above-referenced matter. We write to respectfully request a brief eight day extension of time to move, answer, or respond to the Amended Complaint. Defendant is currently required to respond by March 24, 2016. If the Court grants this request, the date by which Defendant must respond will be April 1, 2016, and no other dates are impacted. This is the second request for an extension of time. The first request was granted.

On March 18, I contacted Plaintiff *pro se* Erick Rivera and asked for his consent. He stated that he agreed the papers were due March 24. When I explained that I was requesting one additional week, he said he believed Defendant's response was due March 24. He then asked for my phone number, which I provided, and said good-bye. Thus, Plaintiff did not give explicit consent.

The reason for this request is that the Amended Complaint, which was recently amended to add a vague claim of defamation, contains a series of allegations that span many years and which have resulted, over the years, in several administrative charges and hearings, which we believe may provide the basis for a dispositive motion to dismiss all claims. One additional week will permit Defendant to complete the review of the files and determine the appropriate strategy for responding to the Amended Complaint.

We appreciate Your Honor's consideration of this request.

Respectfully submitted,

/s JAMIE F. FRIEDMAN

Jamie F. Friedman

cc: Erick E. Rivera
6126 Saunders Street
Rego Park, NY 11374